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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Joint Petition for Rulemaking)
On Cable Television Wiring)
)
)
)

RM-8380

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COMMENTS OF BELL SOUTH

BellSouth Telecommunications, Inc., (BellSouth) hereby files its comments regarding the Joint Petition of the Media Access Project, the United States Telephone Association, and Citizens for a Sound Economy (Petitioners) for Rulemaking to Establish Rules for Subscriber Access to Cable Home Wiring for the Delivery of Competing and Complementary Video Services, filed July 27, 1993.

BellSouth supports Petitioners' request that the Commission initiate a new proceeding to determine how cable subscribers may have access to cable home wiring for the delivery of competing and complementary services before termination of service. Without such rules, incumbent cable television companies may impede or thwart the development of competing providers of video programming and other broadband services by denying them access to cable home wiring that they own or by imposing restrictions on the use of subscriber-owned wiring by competitors as a condition of service.

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The Commission should address the following issues in the rulemaking:

- (1) the right of the subscriber to use subscriber-owned wiring for services from multiple providers without restrictions in cable service contracts;
- (2) subscriber access to cable company-owned wiring and compensation for such access;
- (3) subscriber access to wiring in multi-tenant buildings;
- (4) the use by cable companies of wiring architectures that preclude or impede use by multiple providers;
- (5) interface standards for connection of home wiring or subscribers' wiring control devices to service providers' networks;
- (6) responsibility for signal leakage monitoring and correction in wiring used by multiple providers; and
- (7) the relationship of the rules for telephone inside wiring and cable home wiring in view of the convergence of the two industries.

The issues that must be resolved in order to establish rules to assure subscriber access to cable home wiring for competing and complementary uses are inseparable from issues raised by petitions for reconsideration of the Commission's Report And Order in MM Docket No. 92-260, released

February 2, 1993 (FCC 93-73). Consequently, the Commission should combine its reconsideration of that order with the rulemaking proposed by Petitioners.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.
By its Attorneys:

A handwritten signature in dark ink, appearing to read "Michael A. Tanner", is written over a horizontal line.

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December 21, 1993

CERTIFICATE OF SERVICE

I heraby certify that I have this 21st day of December, 1993 serviced all parties to this action with a copy of the foregoing PETITION FOR RECONSIDERATION by placing a true and correct copy of the same in the United States Mail, postage prepaid, addressed to the parties as set forth on the attached service list.

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